

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-cv-21291 DSL

SHELBY MAYES,

Plaintiff,

vs.

J & J GREEN PAPER, INC. AND  
MICHAEL SCOTT SEGAL,

Defendants.

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**DEFENDANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S STATEMENT OF CLAIM**

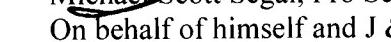
Defendants, J & J Green Paper, Inc. and Michael Scott Segal, respectfully move this Court for a seven (7) day extension of time, through and including June 11, 2025, to file their Response to Plaintiff's Statement of Claim, and in support thereof state:

1. On May 15, 2025, Plaintiff filed her Statement of Claim pursuant to the Court's Order [D.E. 5]. Under that Order, Defendants' current deadline to respond is June 4, 2025.
2. Defendants are in the process of formally retaining counsel, Lisa McKellar Poursine, who is expected to file a notice of appearance shortly. She has requested this short extension to allow adequate time to review the matter and prepare a proper response.
3. Undersigned attempted to confer with Plaintiff's counsel through my in-house counsel Sabrina Puglisi on June 3, 2025. As of the date of this filing, no response was received as to their position.

4. This motion is made in good faith and not for the purpose of delay. No party will be prejudiced by the requested relief.

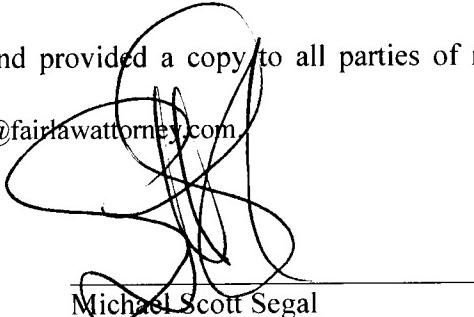
WHEREFORE, Defendants respectfully request that the Court grant this unopposed motion and extend the deadline for filing their Response to Plaintiff's Statement of Claim through and including June 11, 2025.

  
Respectfully submitted,

  
Michael Scott Segal, Pro Se  
On behalf of himself and J & J Green Paper, Inc.  
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CERTIFICATE OF SERVICE

On June 4, 2025, I hand-delivered the Motion for Extension of Time to the Clerk's Office for the Southern District of Florida and provided a copy to all parties of record via email at [brian@fairlawattorney.com](mailto:brian@fairlawattorney.com) and [brooks@fairlawattorney.com](mailto:brooks@fairlawattorney.com).



Michael Scott Segal